

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**STIPULATION AND [PROPOSED] ORDER
REGARDING AGREED AMENDED PTO
NO. 10**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

STIPULATION

WHEREAS, on March 19, 2024, the Court entered PTO No. 10, requiring Plaintiffs to produce Plaintiff Fact Sheets to Defendants.

WHEREAS, Plaintiffs and Defendants have recently negotiated certain amendments to PTO No. 10. *See* [Proposed] Amended PTO No. 10, attached as Exhibit A, and Redline of [Proposed] Amended PTO No. 10 versus original PTO No. 10, attached as Exhibit B.

THEREFORE, the Parties respectfully request that the Court enter the Parties' stipulation and enter [Proposed] Amended PTO No. 10.

IT IS SO STIPULATED.

1 DATED: October 31, 2025

Respectfully submitted,

3 /s/ Laura Vartain Horn

4 Laura Vartain Horn (SBN 258485)
5 **KIRKLAND & ELLIS LLP**
6 555 California Street, Suite 2700
7 San Francisco, CA 94104
8 Telephone: (415) 439-1625
9 laura.vartain@kirkland.com

10 Allison M. Brown (Admitted *Pro Hac Vice*)
11 **KIRKLAND & ELLIS LLP**
12 2005 Market Street, Suite 1000
13 Philadelphia, PA 19103
14 Telephone: (215) 268-5000
15 alli.brown@kirkland.com

16 Jessica Davidson (Admitted *Pro Hac Vice*)
17 **KIRKLAND & ELLIS LLP**
18 601 Lexington Avenue
19 New York, NY 10022
20 Telephone: (212) 446-4800
21 jessica.davidson@kirkland.com

22 *Attorneys for Defendants*
23 UBER TECHNOLOGIES, INC.,
24 RASIER, LLC, And RASIER-CA, LLC
25
26
27
28

1 DATED: October 31, 2025

/s/ Sarah R. London

Sarah R. London (SBN 267083)
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
slondon@lchb.com

/s/ Rachel B. Abrams

Rachel B. Abrams (SBN 209316)
**PEIFFER WOLF CARR KANE CONWAY
& WISE, LLP**
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
Facsimile: (415) 840-9435
rabrams@peifferwolf.com

/s/ Roopal P. Luhana

Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, 12th Floor
New York, NY 10016
Telephone: (888) 480-1123
Facsimile: (888) 499-1123
luhana@chaffinluhana.com

Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Laura Vartain Horn

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**[PROPOSED] ORDER GRANTING
STIPULATION REGARDING AGREED
AMENDED PTO NO. 10**

This Document Relates to:

ALL ACTIONS

The Court hereby GRANTS the Parties' stipulation as follows:

1. The Amended PTO No. 10 attached as Exhibit A shall be entered on the docket and supersede the prior version of PTO No. 10.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____, 2025

HON. CHARLES R. BREYER
UNITED STATES DISTRICT COURT JUDGE